

DAVID MEEGAN

Hearing Date: February 4, 2019 at 10:00 a.m. E.T.

MEEGAN, HANSCHU & KASSEN BROCK

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Attorneys for Creditors Loki Investments, LLC,
Michael Rue, J. Terry Eager and Susan B. Eager,
as Co-Trustees of the J. Terry Eager Family
Trust-1995, and CEMER Properties

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**SEARS HOLDINGS CORPORATION,
et al.,**

Debtor.

Chapter 11

Case No. 18-23538 (RDD)

(Joint Administered)

**OBJECTION OF STORE NO. 8768 LESSORS
TO CURE AMOUNT SET FORTH IN EXHIBIT B-1 TO THE
SUPPLEMENTAL NOTICE OF CURE COSTS AND POTENTIAL
ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS AND
UNEXPIRED LEASES IN CONNECTION WITH GLOBAL SALE TRANSACTION**

The lessors of Store No. 8768 ("Lessors") located at 1200 Blumenfeld Drive,
Sacramento, California represent as follows:

1. The Lessors have reviewed Exhibit B-1 to the supplemental Notice of Cure
Costs and Potential Assumption and Assignment of Executory Contracts and
Unexpired Leases in Connection with Global Sale Transaction ("Supplemental Notice").
Exhibit B-1 of the Supplemental Notice lists the Lessors' lease as No. 357 on page 13

and provides a cure amount of \$29,500.00. That cure amount is inaccurate and should be \$31,710.67.

The Lessors reserve their rights to object to the actual assumption and assignment of their lease at a later time should circumstances warrant such an objection after further evidence related to the financial wherewithal of the proposed assignee/purchaser is obtained.

MEEGAN, HANSCHU & KASSEN BROCK

DATED: February 1, 2019

/s/ *David M. Meegan*
DAVID M. MEEGAN
Attorneys for Creditors Loki Investments, LLC,
Michael Rue, J. Terry Eager and Susan B.
Eager, as Co-Trustees of the J. Terry Eager
Family Trust-1995, and CEMER Properties

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served by ECF electronic noticing on this 1st day of February, 2019, upon all counsel of record.

/s/ **David M. Meegan**